

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	14 Cr. 68 (KBF)
- against -	:	
ROSS ULBRICHT,	:	NOTICE OF MOTION
	:	IN SUPPORT OF
	:	DEFENDANT
Defendant.	:	ROSS ULBRICHT'S
	:	<u>POST-TRIAL MOTIONS</u>
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PLEASE TAKE NOTICE, that upon the annexed Declaration of Joshua L. Dratel, Esq., and all prior papers and proceedings herein, the defendant, ROSS ULBRICHT, will move before the Honorable Katherine B. Forrest, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, at a time and date to be set by the Court, or as soon thereafter as counsel may be heard, for the following relief:

- (a) an Order of a new trial, pursuant to Rule 33, Fed. R. Crim. P., based upon the government's failure to provide exculpatory material in a timely manner;
- (b) an Order renewing Mr. Ulbricht's suppression motion(s) and granting them in their entirety and/or for a hearing on the suppression motion(s); and,

for any such other and further relief as to the Court seems just and proper.

Dated: New York, New York
6 March 2015

/S/ Joshua L. Dratel
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Attorneys for Defendant Ross Ulbricht

To: CLERK OF THE COURT

UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF NEW YORK

ALL DEFENSE COUNSEL